

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	
	:	
EARLE STANLEY GREER	:	Bankruptcy No. 18-18146ELF
	:	Chapter 11
Debtor	:	
	:	

ORDER

AND NOW, this day of , 2019, after hearing, the Trustee's Motion to Dismiss is Denied. Debtor is hereby allowed to continue his case as a Chapter 11 debtor.

FOR THE COURT:

Interested parties:

Dave P. Adams
Office of the United States Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106
215 597-4411
215 923-1293 (fax)
Dave.p.adams@usdoj.gov

Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, P A 19050
Telephone: 610.622.3660
vah963@gmail.com
Counsel for the Debtor

Hon. Eric L. Frank, B.J.

Earle Stanley Greer
3 Carriage Lane
Lansdowne, PA 19050

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	
	:	
EARLE STANLEY GREER,	:	Bankruptcy No. 18-18146ELF
	:	Chapter 11
Debtor.	:	HEARING TO BE HELD
	:	Date: October 23, 2019
	:	Time: 11:00 a.m.
	:	Place: Courtroom #1

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS OR CONVERT TO
CHAPTER 7

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Debtor answers as follows:

1. Thru 3. Admitted, however it must be noted that Debtor is filing this date his Motion seeking a conditional Order, his disclosure statement and his plan.
4. The Debtor is in the process of filing all due monthly operating reports including the one for September 2019, which is included as an exhibit to his disclosure statement.
5. Debtor is fully committed to following through and fulfilling his obligations pursuant to this bankruptcy case.

WHEREFORE, Debtor respectfully requests that he be allowed to continue in this Bankruptcy as a Chapter 11 debtor.

Respectfully submitted,

Valerie A. Hibbert, Esq.

Date: October 1, 2019

Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, P A 19050
Telephone: 610.622.3660
vah963@gmail.com
Counsel for the Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	
EARLE STANLEY GREER	:	Bankruptcy No. 18-18146ELF
	:	Chapter 11
Debtor	:	
	:	

CERTIFICATE OF SERVICE

I, Valerie A. Hibbert, Esq., do hereby certify that true and correct copies of Debtor's Answer to Trustee's Motion to Dismiss has been served this 1st day of October 2019 by first class mail upon those listed below:

Dave P. Adams
Office of the United States Trustee
200 Chestnut Street, Suite 502
Philadelphia, Pennsylvania 19106

Valerie A. Hibbert, Esq.

Valerie A. Hibbert, Esq.
Attorney for Debtor